

EXHIBIT E

Natasha Prinzing Jones
(MT Bar No. 5226)
Matthew B. Hayhurst
(MT Bar No. 4979)
BOONE KARLBERG P.C.
201 West Main St., Suite 300
P.O. Box 9199
Missoula, MT 59807
Telephone: (406) 543-6646
Facsimile: (406) 549-6804
npjones@boonekarlberg.com
mhayhurst@boonekarlberg.com

Attorneys for Plaintiffs Samantha Alario, Heather DiRocco, Carly Ann Goddard, Alice Held, and Dale Stout

Ambika Kumar (*admitted PHV*)
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 330
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7700
ambikakumar@dwt.com

Tim Cunningham (*admitted PHV*)
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
Telephone: (503) 241-2300
Facsimile: (503) 778-5299
timcunningham@dwt.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

SAMANTHA ALARIO, HEATHER DIROCCO, CARLY ANN GODDARD, ALICE HELD, and DALE STOUT,

Plaintiffs,

v.

AUSTIN KNUDSEN, in his official capacity as Attorney General of the State of Montana,

Defendant.

Lead Case No.
9:23-cv-00056-DWM
CV 23-56-M-DWM

Member Case No.
CV 23-61-M-DWM

**DECLARATION OF DALE STOUT
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

I, Dale Stout, declare as follows:

1. I make this declaration from personal knowledge.
2. I grew up in Washington state, where I worked as a volunteer firefighter. In 2007, I came to Montana to fight a wildfire in Livingston and decided to make my home here. I continued to work as a firefighter through 2019 and eventually moved to Missoula, where I now work in commercial construction.
3. I joined TikTok in 2019. I quickly found it to be an incredible place to meet new people and form deep relationships and community. I have created a very close group of friends on TikTok who are located all over the world, including Montana, California, Florida, Puerto Rico, and even Australia. Despite our physical distance, we are very supportive of each other—always checking in if someone is going through a difficult time and sharing positive thoughts. Once, we even paid the electricity bills for one community member when she was out of work. This community has meant the world to me and kept me feeling strong and connected, even during lonely and isolated times like the Covid-19 pandemic.
4. I use TikTok to maintain connection with the growing community that I have met and built on the app. We reach out to talk to those who need help, and have supported many people struggling with depression and isolation. Nine years ago, I lost my mother to suicide and it hit me harder than anything else in my

life. This experience made me realize the importance of community and connection. I am on TikTok to be that support system for others.

5. Eventually, I decided to try posting videos on TikTok, mostly for entertainment and to share my sense of humor and expression with my TikTok community. My content resonated with others, and I now have 44,000 followers.

6. I use TikTok more to connect with others and form relationships than I do for financial gain. However, I do generate some income from my videos, which has helped me with bills and household expenses. Most of the income that I generate from TikTok comes from brand deals or “live-streaming” on the app—a process in which creators connect with their followers through real-time video and followers can tip if they like the content.

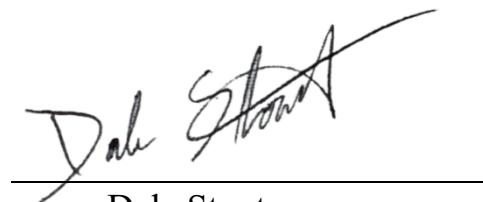
7. I also use TikTok as a source for education. I enjoy learning about current events on TikTok because I find that certain creators discuss this content in a transparent and unbiased way. I also enjoy learning new things on TikTok, including, for example, information on physical health.

8. I much prefer using TikTok over any other social media app. While I have tried Facebook and Instagram, I do not use them anymore and have stopped posting on Instagram. I have found the community on TikTok to be the strongest and most positive of all of the social media experiences.

9. If the Montana TikTok ban is allowed to take effect, it will destroy the special community that has added so much value and joy to my life these past few years. For many of us, TikTok is far more than just an entertainment app, it is a big part of our daily lives and an important source for connection, positivity, and learning in an increasingly isolated world. I joined this lawsuit to stand up for what is right and to defend this community.

I declare under penalty of perjury that the foregoing is true and correct.

Signed in Missoula, Montana this 5th day of July, 2023.



Dale Stout